## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE: DEALER MANAGEMENT SYSTEMS ANTITRUST LITIGATION

This Document Relates to All Cases

MDL No. 2817 Case No. 18 C 864

Hon. Robert M. Dow, Jr. Magistrate Judge Jeffery T. Gilbert

## MDL PLAINTIFFS' OMNIBUS MOTION TO COMPEL

MDL Plaintiffs respectfully move this Court for an Order compelling Defendants CDK Global, LLC ("CDK") and The Reynolds and Reynolds Company ("Reynolds") (collectively, "Defendants") to produce documents pursuant to Rule 37 of the Federal Rules of Civil Procedure. In support of this Motion, MDL Plaintiffs incorporate by reference the memorandum of law filed concurrently herewith, any reply memorandum that MDL Plaintiffs may file, and any oral argument that the Court may allow at a hearing on this Motion.

Pursuant to Local Rule 37.2, MDL Plaintiffs certify that they have met and conferred with counsel for Defendants via telephonic conferences as well as written communications in a good faith attempt to resolve the dispute presented by this motion.

Dated: August 6, 2018

/s/ Derek T. Ho

Respectfully submitted,

/s/ Peggy J. Wedgworth

Peggy J. Wedgworth

MILBERG TADLER PHILLIPS GROSSMAN LLP

One Pennsylvania Plaza, 19th Floor New York, NY 10119 (212) 594-5300 pwedgworth@milberg.com Derek T. Ho
KELLOGG, HANSEN, TODD,

FIGEL & FREDERICK, P.L.L.C. 1615 M Street, NW, Suite 400 Washington, D.C. 20036 (202) 326-7932 dho@kellogghansen.com

MDL Co-Lead Counsel

## **CERTIFICATE OF SERVICE**

I, Derek T. Ho, an attorney, hereby certify that on August 6, 2018, I caused a true and correct copy of the foregoing **MDL PLAINTIFFS' OMNIBUS MOTION TO COMPEL** to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by email to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Derek T. Ho

Derek T. Ho
KELLOGG, HANSEN, TODD,
FIGEL & FREDERICK, P.L.L.C.
1615 M Street, NW, Suite 400
Washington, D.C. 20036
(202) 326-7900
dho@kellogghansen.com